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U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

GENO TRUNZO,

Defendant.

) INDICTMENT
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CASE NO. **1 : 15 CR 307**

Title 18, United States Code
Sections 513(a), 1957, and 2

JUDGE

JUDGE LIOI

The Grand Jury charges:

GENERAL ALLEGATIONS

At all times material to this Indictment:

1. Defendant GENO TRUNZO ("TRUNZO") was a resident of Mayfield Heights, Ohio, which is located in the Northern District of Ohio, Eastern Division.
2. From approximately in or around July 2004 through in or around December 2014, TRUNZO worked at Company A, a corporation headquartered in the Northern District of Ohio, Eastern Division, and engaged in the retail sale of mattresses and bedding products.
3. In or around late 2005, Company A promoted TRUNZO to be the company's Controller.

4. As Controller, his duties included managing and administering Company A's accounts payable and accounts receivable.

5. TRUNZO was also responsible for paying Company A's business expenses and had access to Company A's books, records, checks, and credit lines.

6. TRUNZO forged and created approximately 431 checks drawn on Company A's bank accounts by affixing, without authorization, a stamped image of the name of an authorized signer on the checks.

7. TRUNZO made the checks payable to himself and to third party payees for his personal benefit.

8. As a result of his conduct, TRUNZO caused a loss to Company A of approximately \$677,131.

COUNT 1

(Making or Possessing Forged Securities of Private Entities, 18 U.S.C. §§ 513(a) and 2)

9. The general allegations of paragraphs 1-8 of this Indictment are realleged and incorporated by reference as if fully set forth herein.

10. From in or around December 2007, and continuing through in or around December 2014, the exact dates being unknown to the Grand Jury, in the Northern District of Ohio, Eastern Division, GENO TRUNZO did make and possess a counterfeited security of an organization, that is, Company A, a nongovernmental legal entity that operated in and whose activities affected interstate and foreign commerce, with the intent to deceive another person and organization, in violation of Title 18, United States Code, Section 513(a) and 2.

COUNTS 2-5
(Money Laundering, 18 U.S.C. §§ 1957 and 2)

The Grand Jury further charges:

11. The general allegations of paragraphs 1-8 of this Indictment are realleged and incorporated by reference as if fully set forth herein.

12. On or about the dates set forth below, in the Northern District of Ohio, Eastern Division, and elsewhere, GENO TRUNZO did knowingly engage and attempt to engage in the following monetary transactions by, through, and to a financial institution, affecting interstate commerce, in criminally derived property of a value greater than \$10,000, that is the deposit, withdrawal, or transfer of funds and monetary instruments, such property having been derived from a specified unlawful activity, that is, making and possessing forged securities of private entities, in violation of Title 18, United States Code, Section 513(a):

<u>COUNT</u>	<u>DATE</u>	<u>MONETARY TRANSACTION</u>	<u>AMOUNT</u>
2	May 24, 2011	Company A Check No. 17048, drawn on PNC Bank, payable to GENO TRUNZO, and deposited into TRUNZO's Third Federal Savings and Loan account x1636.	\$10,500
3	June 29, 2011	Company A Check No. 17236, drawn on PNC Bank, payable to GENO TRUNZO, and deposited into TRUNZO's Third Federal Savings and Loan account x1636.	\$10,500
4	February 21, 2014	Company A Check No. 22499, drawn on PNC Bank, payable to GENO TRUNZO, and deposited into TRUNZO's Third Federal Savings and Loan account x1636.	\$21,000
5	May 8, 2014	Company A Check No. 22684, drawn on PNC Bank, payable to American Express.	\$15,000

All in violation of Title 18, United States Codes, Sections 1957 and 2.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.